

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

In re:)	Chapter 11
)	
INTEGRATED HEALTH SERVICES, INC., et al.,)	Case No. 00-389(MFW)
)	(Jointly Administered)
Debtors.)	
)	
)	
IHS LIQUIDATING LLC,)	
)	
Plaintiff,)	C.A. No. 05-376(GMS)
)	
v.)	
)	
ACE INDEMNITY INSURANCE COMPANY)	
f/k/a INDEMNITY INSURANCE COMPANY)	
OF NORTH AMERICA,)	
)	
Defendant.)	

**NOTICE OF ORAL DEPOSITION OF CORPORATE DESIGNEE
PURSUANT TO FEDERAL RULE OF CIVIL PROCEDURE 30 (B) (6)**

TO: James F. Harker, Esquire
 Cohen, Seglias, Pallas, Greenhall & Furman, PC
 Nemours Bldg. - Ste. 1130
 1007 Orange Street
 Wilmington, DE 19801

PLEASE TAKE NOTICE that, Defendant, ACE Indemnity Insurance Company, pursuant to Federal Rules of Civil Procedure 30(b)(6), will take the deposition upon oral examination of the corporate designee of General Star Management Company at 10:00 a.m. on Tuesday, February 20, 2007 and continuing daily until completed at offices of Chait Digital located at Two Stamford Landing, 68 Southfield Avenue, Stamford, CT 06901 before a notary or other officer of the Court.

Pursuant to Federal Rule of Civil Procedure 30(b)(6), General Star Management Company must designate one or more of its officers, directors or managing agents or there persons who consent to testify on its behalf and is the person most knowledgeable concerning the subject matters set forth in Section "A" of this Notice.

A. AREAS OF INQUIRY

1. Person most knowledgeable of underwriting, reviewed application for insurance and issuance of binder and policy to Integrated Health Services, Inc. for the period January 1, 1999 to January 1, 2000 and for period January 1, 2000 to January 1, 2002.
2. Person most knowledgeable of underwriting, reviewed application for insurance and issuance of binder and policy to Integrated Health Services of Lester, Inc. for the period January 1, 1999 to January 1, 2000 and for period January 1, 2000 to January 1, 2001.
3. Person most knowledgeable with regard to the underwriting policies and procedures used by General Star Management Company in the review and issuance of Commercial Umbrella policies to Integrated Health Services, Inc. And Integrated Health Services of Lester, Inc. during the period January 1, 1997 to January 1, 2001.
4. Person most knowledgeable with regard to revisions and endorsements added to General Star Management company policies IXG-347714B and IXG-347714C.
5. Person most knowledgeable regarding contract with and retention of Hamlin & Burton Liability Management, Inc. to serve as claims administrator.

6. Person most knowledgeable regarding claims administration and oversight of administrator Hamlin & Burton Liability Management, Inc.

WETZEL & ASSOCIATES, P.A.

/s/Benjamin C. Wetzel, III

BENJAMIN C. WETZEL, III (ID No. 985)

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Company of North America*

Of Counsel:

Ward A. Rivers, Esquire

Deasey, Mahoney & Bender, Ltd.

1800 John F. Kennedy Blvd., Suite 1300

Philadelphia, PA 19103-2978

Date: February 6, 2007

CERTIFICATE OF SERVICE

I certify that on February 6, 2007, I electronically filed the within Notice of Deposition with the Clerk of the Court using CM/ECF which will send notification of such filing to the following:

Garven F. McDaniel, Esquire
Bifferato Gentilotti & Balick
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and served through the U.S. Mail:

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Insurance Company of North America*

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Date: February 6, 2007